Torres, Francine

From: sandy@neptunesharvest.com%inter2 [sandy@neptunesharvest.com] on behalf of sandy@neptunesharvest.com
Sent: Wednesday, August 10, 2005 1:24 PM
To: National List
Subject: Sunset Reviews

Importance: High

Dear Mr. Arthur Neal,

My Name is Mr. Sandy Parco. My family and I have been in the fish business for four generations. Working out of the port of Gloucester, we along with the fisherman have had to endure catch limits, area closures and size requirements. With less fish coming into the port, we had to look for alternatives. Gloucester had a problem of what to with the fish waste. The federal tech station and U-Mass extension in Gloucester worked together to come up with a way to turn this waste into a valuable fertilizer. They brought this idea to us, as well as others to see if we would be interested in making the investment to produce a product. In 1986, we started production.

We now produce what I believe to be the best fertilizer in the world. From Essex county in MA. in 1986, through out the USA, and into Canada & Mexico and on to Europe and the Pacific Rim today. We have worked hard to make this happen.

The organic community has grown in great part because of the use of fish in this country. The fish waste from the processing industries, for the most part, is now being utilized for the good of our country. In the past, this waste was either dumped at sea or put into landfills. Both creating environmental problems. We do not kill fish just to make fertilizer. We take the waste, after the fish is used for human consumption.

The tools that organic farmers are using and have used for decades should not taken away, unless they are proven to cause a problem, and fish, does not. Fish fertilizer has been used since the time of the pharaohs in Egypt on to the time of the Pilgrims.

I know the problem or question stems from the use of acid as a stabilizer.
The old fish emulsions use sulfuric, the least expensive. The new generation of fish products are the Hydrolysates which use phosphoric, the safest to use in production. Both of these are good stabilizers and allow manufactures to maintain the 3.5 pH that is required. Other acids that are considered Organic do not have the buffering ability necessary to keep a stable product and a pH of 3.5 may not be enough to keep the fish from spoiling. Also, the cost of these acids are much higher and would have to be passed on to the farmers.

I would also like to see seaweed and humates remain on the allowed list, along with the fish.

Sandy Parco, pres.
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Member of OTA (Organic Trade Association)
Serve on OSAC Committee (Organic Suppliers Advisory Council)

Serve on Fertilizer Task Force Committee
Serve on OMRI Board of Directors (Organic Material Review Institute)

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